

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	
	:	CHAPTER 7
	:	
Barry Portnoy	:	BANKRUPTCY NO. 14-16081-mdc
	:	
Debtor.	:	
	:	

**PRAECIPE TO WITHDRAW OPPOSITION [Docket No. 422] TO MOTION OF
TRUSTEE, ROBERT H. HOLBER, ESQUIRE, FOR MOTION TO APPROVE
AGREEMENT BY AND BETWEEN THE TRUSTEE AND REPUBLIC BANK TO
JOINTLY PURSUE AND ALLOCATE FUNDS RECOVERED IN CONNECTION WITH
CLAIMS**

Parties-in-Interest (i) Danielle Portnoy, (ii) Samantha Portnoy, (iii) Zachary Portnoy, (iv) Altchem Environmental Services, Inc., (v) Samzach Partners, L.P., (vi) Sam-Zachary Partners, LLC, (vii) BF Services, L.P., (viii) Maxis Construction Group (incorrectly sued herein as Maxsys, Inc.), (ix) Danielle Portnoy as co-trustee of the Revocable Deed of Trust of Danielle M. Portnoy, (x) Samantha Portnoy as co-trustee of the Revocable Deed of Trust of Danielle M. Portnoy, (xi) Danielle Portnoy as custodian for Zachary Portnoy and Samantha Portnoy, and (xii) Danielle Portnoy as Trustee of the SamZach Irrevocable Trust (“**Opposition Parties**”) by their undersigned counsel Bochetto & Lentz, P.C., hereby withdraw their Opposition to the Motion (“**Motion**”) of Trustee, Robert H. Holber, Esquire for an Order pursuant to 11 U.S.C. § 105 and Fed. R. Bankr. P. 9019, approving the Agreement by and between the Trustee and Republic First Bank to Jointly Pursue and Allocate Funds Recovered in Connection with Claims (the Motion is docketed at Docket No. 410).

The withdrawn Opposition was docketed at Docket No. 422 in the docket for the above-referenced bankruptcy.

Respectfully submitted,

BOCHETTO & LENTZ, P.C.

DATED: December 3, 2018

BY:

/s/ Albert M. Belmont, III

George Bochetto

(Pa. I.D. No. 27783)

Albert M. Belmont, III

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Attorneys for Danielle Portnoy, Danielle Portnoy, as custodian for Zachary Portnoy and Samantha Portnoy, Danielle Portnoy, as Trustee of the SamZach Irrevocable Trust, Danielle Portnoy, as co-trustee of the Revocable Deed of Trust of Danielle M. Portnoy, Samantha Portnoy, Samantha Portnoy, as co-trustee of the Revocable Deed of Trust of Danielle M. Portnoy, Alchem Environmental Services, Inc., Zachary Portnoy, Samzach Partners, L.P., Sam-Zachary Partners, LLC, BF Services, L.P. and Maxis Construction Group

CERTIFICATE OF SERVICE

I, Albert M. Belmont, III, Esq., hereby certify that, on this 3rd day of December 2018, I caused a true and correct copy of the foregoing to be electronically filed with the Court, and served upon counsel of record by electronic mail via the Court's CM/ECF system.

BOCHETTO AND LENTZ, P.C.

DATED: December 3, 2018

BY:

/s/ Albert M. Belmont, III
Albert M. Belmont, III